

Baker

06.01-9/9/99-02498

Baker Environmental, Inc.
Airport Office Park, Building 3
420 Rouser Road
Coraopolis, Pennsylvania 15108

(412) 269-6000
FAX (412) 269-2002

September 9, 1999

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attn: Ms. Katherine Landman
Navy Technical Representative
Code 18232

Re: Contract N62470-89-D4814
Navy CLEAN, District III
Contract Task Order (CTO) 0099
Comment Response
Draft CERCLA Five-Year Review
Marine Corps Base (MCB) Camp Lejeune, North Carolina

Dear Ms. Landman:

Baker Environmental, Inc. (Baker) has reviewed the comments provided by Environmental Management Department (EMD) at Camp Lejeune, the U.S. Environmental Protection Agency (USEPA), Region IV, and the North Carolina Department of Environmental and Natural Resources (NC DENR) regarding the Draft CERCLA Five-Year Review. The regulatory comments are provided as Attachment A, and the comment responses are provided as Attachment B.

These comment responses have been incorporated into the Final CERCLA Five-Year Review dated August 24, 1999. A copy of this letter, including attachments, has been forwarded to the following: Mr. Geoff Cullison, U. S. Environmental Protection Agency, North Carolina Department of Environment and Natural Resources including Mr. David Lown and Ms. Diane Rossi, Agency for Toxic Substance and Disease Registry (ATSDR), Naval Environmental Health Center (NEHC) and OHM Corporation. Should you have any questions regarding this matter, please contact me at (412) 269-2062.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Kathy Chavara, P.E.
Activity Coordinator, Camp Lejeune

cc: Ms Lee Ann Rapp, Code 18312 (w/o attachments)
Ms. Beth Collier, Code 02115 (w/o attachments)
Mr. Rick Raines, MCB Camp Lejeune

ATTACHMENT A

**UNITED STATES MARINE CORPS**

MARINE CORPS BASE
PSC BOX 20004
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:

6286
BEMD

30 JUN 1999

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commander, Atlantic Division, Naval Facilities Engineering Command,
(Code 1823), 1510 Gilbert Street, Norfolk, Virginia 23511-2699

SUBJ: DRAFT FIVE-YEAR REVIEW, MARINE CORPS BASE, CAMP LEJEUNE,
NORTH CAROLINA

Encl: (1) Comments on the Draft Five-Year Review, Marine Corps Base, Camp
Lejeune, North Carolina

1. The subject document has been reviewed by the Installation Restoration Division. Our comments are contained in the enclosure.
2. It is requested that the Installation Restoration Division, Environmental Management Department, Marine Corps Base, Camp Lejeune, be notified of the actions taken to accommodate the comments.
3. If you have any questions or comments, please contact Mr. Rick Raines, Installation Restoration Division, Environmental Management Department, at DSN 751-5068 or commercial telephone number (910) 451-5068.

Scott A. Brewer
for

SCOTT A. BREWER, PE
By direction

OPTIONAL FORM 89 (7-90)

FAX TRANSMITTAL

To	KATHY CHAUARA	From	KATE LANDMAN
Dept./Agency		Phone #	
Fax #	412-269-2002	Fax #	

NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION

**Comments on the Draft Five-Year Review,
Marine Corps Base, Camp Lejeune, North Carolina**

General Comments:

1. The recommendations, while extremely limited in quantity and very basic in nature, are desired and appreciated.
2. It is requested that a more thorough evaluation of the current remediation technologies in use at Camp Lejeune be completed within this document. Additionally, a review of other remedial technologies that could improve the remediation efforts aboard Camp Lejeune is also warranted.

Specific Comments:

1. Section 1.2 General Description of MCB, Camp Lejeune, first paragraph, first sentence (page 1-2). Text states that "MCB, Camp Lejeune is located in Onslow County, North Carolina and is host to six Marine Corps Commands....." Change this to read: "...five Marine Corps commands...".
2. Section 1.2 General Description of MCB, Camp Lejeune, first paragraph, second sentence (page 1-2). Delete: Headquarters, Marine Forces Atlantic.
3. Section 1.2 General Description of MCB, Camp Lejeune, first paragraph, second sentence (page 1-2). Delete: "Marine" in "Second Marine Force Service Support Group" and in "Second Marine Surveillance, Reconnaissance, and Intelligence Group."
4. Section 2.3.1 Site 48 (MCAS Mercury Dump), first paragraph (page 2-10). Change the rest of the paragraph starting with the sixth sentence ("During the late 1950s....") to read: "From 1956 to 1966 mercury was drained from radar units periodically and disposed in woods near the photo lab (Building AS-804). Approximately 1 gallon per year over 10 years, i.e., more than 1,000 pounds total, was hand carried to an area between Building AS-804 and the New River. This mercury was then dumped or buried in small quantities at randomly selected spots. The building is currently used as a classroom training facility for Nuclear, Biological, and Chemical Warfare training."
5. Section 2.8.1.5 Recommendations, second sentence (page 2-26). Delete the second sentence recommending a fence, as the land use controls in the ROD only calls for: "no development for residential purposes and no supply water wells within 1,000 feet."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303**

April 27, 1999

4WD-FFB

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Katherine Landman
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune
Draft Five Year Review

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Comments are enclosed. If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

A handwritten signature in cursive script, reading "Gena D. Townsend", is written over the typed name.

Gena D. Townsend
Senior Project Manager

Enclosure

cc: Dave Lown, NCDEHNR
Rick Raines, MCB Camp Lejeune

Comments

1. Include a signature page to be signed by DOD; (i.e., Base Commander or Head of the Environmental Department), to document the determination of protectiveness. The determination should be that (1) the remedies are protective; (2) they are not protective; or (3) they would be protective if certain measures were taken.
2. Page 2-27, 2-28 (OU10) - This section does not include a discussion of the sediment and surface water conditions. The NA determination will rely heavily on the discharge points for OU10. These points are the sediment and/or surface water pathways. A sentence or two added to the text will be sufficient since the site is still in the investigation stage.
3. Page 2-34, Section 2.13.1.2 - Summary of Site Visit - Last sentence is unclear. Are there 6 wells and 3 have been abandoned or 3 wells which should be abandoned?
4. Page 2-36, Section 2.15 (OU15) - A ROD will not be signed during 1999, maybe 2000
5. Page 2- 4, Section 2.17 (OU17) - ROD will not be signed during 1999.
6. Page 2- 45 - Site 10 will require institutional controls to prohibit intrusive activities. Add I/C requirement to sections 2.19.1.1 and 2.19.1.5.

CD-0099

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT



JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

June 3, 1999

Commander, LANTNAVFACENGCOM
Attention: Ms. Katherine Landman, Code 1823
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: NC Superfund Section Comments
Draft CERCLA Five-Year Review
MCB Camp Lejeune

Dear Ms. Landman:

We reviewed of this document and submit the attached comments. We appreciate the opportunity to review this document. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune

NC Superfund Comments
Draft CERCLA Five-Year Review
MCB Camp Lejeune
June 3, 1999

The following state ARARs should be added to Tables 1-2, 1-3, and 1-4.

Additional ARARs to be added to TABLE 1-2
CHEMICAL-SPECIFIC ARARs

ARAR	General Citation	Requirement Description
NC Air Pollution Control Regulations	15A NCAC 2D, 2H .0600, 2Q	Establishes air quality standards for hazardous air pollutants and regulates ambient air quality. May be applicable if onsite treatment or excavation is part of the Remedial Action.
NC Drinking Water Act	North Carolina General Statute 130A 311-327	Regulates water systems with the State that supply drinking water that may affect public health

Additional ARARs to be added to TABLE 1-3
 LOCATION-SPECIFIC ARARs

ARAR	General Citation	Requirement Description
NC Hazardous Waste Management Rules	15A NCAC 13A .0009 & .0012	Location requirements and land disposal restrictions for hazardous waste excavated, stored, and treated onsite.
NC Solid Waste Management Rules	15A NCAC 13B .1600	Siting requirements for solid waste landfill facilities
NC Recordation of Inactive Hazardous Substance or Waste Disposal Sites Statute	North Carolina General Statute 130A-310.8	State requirement for recordation of inactive hazardous sites
NC Coastal Management	15A NCAC 7H	State guidelines for areas of environmental concern

Additional ARARs to be added to TABLE 1-4
 ACTION-SPECIFIC ARARs

ARAR	General Citation	Requirement Description
NC Groundwater Corrective Action	15A NCAC 2L .0106	Regulations for cleanup of contaminated groundwater
NC 15A NCAC 2L Implementation Guidance	Division of Water Quality Guidance Document	Guidance for implementation of corrective action at groundwater contamination sites. TBC
NC Well Construction and Abandonment Standards	15A NCAC 2C .0100	Construction and abandonment requirements for water wells
NC Injection Well Construction Standards	15A NCAC 2C .0200	Construction requirements for injection wells

Additional ARARs to be added to TABLE 1-4
 ACTION-SPECIFIC ARARs (Continued)

ARAR	General Citation	Requirement Description
NC Water Quality Discharge Requirements	15A NCAC 2H .0100 &.0200	Requirements for waste water discharges and infiltration galleries
NC Sedimentation Control Rules	15A NCAC 2H .1000	Establishes requirements for stormwater management and erosion control
NC Harzardous Waste Management Rules	15A NCAC 13A	Design, treatment, and monitoring requirements for hazardous waste TSDs
NC Solid Waste Management Rules	15A NCAC 13B	Design and monitoring requirements for solid waste disposal sites
NC Air Pollution Control Requirements	15A NCAC 2D, 2H .0600, 2Q	Regulates emission of hazardous substances into the air.

ATTACHMENT B

**Response to comments submitted by EMD Camp Lejeune, Dated June 30, 1999
On the Draft CERCLA Five-Year Review**

General Comments

Response to Comment 1 -

You're welcome.

Response to Comment 2 -

Baker concurs that such an evaluation would be beneficial; however an evaluation of the remedial technologies is out of scope for the five-year review. Radian is currently conducting an independent evaluation of the remedial technologies in use at Camp Lejeune. Radian's document should provide the desired information.

Specific Comments

Response to Comment 1 -

Concur. The text will be changed to read: "...five Marine Corps commands...".

Response to Comment 2 -

Concur. "Headquarters, Marine Forces Atlantic" will be deleted from the text.

Response to Comment 3 -

Concur. "Marine" will be deleted in the two phrases called out in the comment.

Response to Comment 4 -

Concur. The remainder of the paragraph will be changed according to the comment.

Response to Comment 5 -

Concur. The recommendation in Section 2.8.1.5, second sentence will be deleted.

**Response to comments submitted by U.S. Environmental Protection Agency, Region IV,
dated April 27, 1999 On the Draft CERCLA Five-Year Review**

Response to Comment 1 -

Concur. A signature page will be added to the front of the document according to this comment.

Response to Comment 2 -

Concur. A discussion of surface water and sediment conditions at O.U. No. 10 will added to Section 2.10.1.

Response to Comment 3 -

Concur. This section will be revised to state that three wells remain at Site 63, and that all three wells will need to be abandoned.

Response to Comment 4 -

Concur. This section will be revised to state that a ROD may be signed in 2000.

Response to Comment 5 -

Concur. This section will be revised to state that a ROD may be signed in 2000.

Response to Comment 6 -

Concur. Language will be added to Sections 2.19.1.1 and 2.19.1.5 stating that Site 10 will require institutional controls to prohibit intrusive activities.

Response to comments submitted by North Carolina Department of Environment and Natural Resources, dated June 3, 1999 On the Draft CERCLA Five-Year Review

Baker concurs with the additional ARARs in the comment and are included within the Five-Year Review text as follows:

Table 1-2

- NC Air Pollution Control Regulations
- NC Drinking Water Act

Table 1-3

- NC Hazardous Waste Management Rules
- NC Solid Waste Management Rules
- NC Recordation of Inactive Hazardous Substance or Waste Disposal Sites Statute
- NC Coastal Management

Table 1-4

- NC Groundwater Corrective Action
- NC 15A NCAC 2L Implementation Guidance
- NC Well Construction and Abandonment Standards
- NC Injection Well Construction Standards
- NC Water Quality Discharge Requirements
- NC Sedimentation Control Rules
- NC Hazardous Waste Management Rules
- NC Solid Waste Management Rules
- NC Air Pollution Control Regulations